

IN THE FIFTH CIRCUIT COURT
FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

SHAUNDELLE BROOKS, individually,)
and next-of-kin to the deceased,)
AKILAH DASILVA,)

Plaintiff,)

TRAVIS REINKING and)
JEFFREY L. REINKING,)

Defendants.)

No. 18C1777
JURY DEMANDED

**DEFENDANT, JEFFREY L. REINKING'S, SUPPLEMENTAL
RESPONSES TO PLAINTIFF'S FIRST REQUESTS FOR ADMISSION**

Comes now defendant, Jeffrey L. Reinking, by and through counsel, pursuant to Tenn. R. Civ. P. 26.05 and 36, and does hereby submit his supplemental responses to plaintiff's First Requests for Admission ("Requests").

GENERAL OBJECTION

Jeffrey Reinking objects to the definitions and instructions of plaintiff's Requests to the extent these definitions and instructions do not conform to the requirements and obligations of Tenn. R. Civ. P. 36. Furthermore, in responding to plaintiff's Requests, Mr. Reinking does not adopt the definitions used by plaintiff in any way other than to make his response to the corresponding Requests.

5. Admit that the Bushmaster XM-15 rifle was used by Travis Reinking in the State of Tennessee to kill Akilah Dasilva.

ORIGINAL RESPONSE:

Jeffrey Reinking has no firsthand knowledge of this fact other than what can be learned in the media, and therefore this Request is denied.

SUPPLEMENTAL RESPONSE:

After reasonable inquiry, the information known or readily obtainable is insufficient to enable Jeffrey Reinking to admit or deny. Jeffrey Reinking has no firsthand knowledge of this fact. A search on the Internet has revealed the following news articles published by the Tennessean: <https://www.tennessean.com/story/news/2018/05/05/akilah-dasilva-victim-waffle-house-shooting-honored-funeral-hero-kind-friend/557548002/>; <https://www.tennessean.com/story/news/2018/04/22/local-musician-akilah-dasilva-among-victims-waffle-house-shooting/540392002/>. Neither article makes any mention of a Bushmaster XM-15 rifle. Furthermore, news articles are insufficient to enable Jeffrey Reinking to admit or deny.

12. Admit that at the time you returned the Bushmaster XM-15 rifle to Travis Reinking, Taylor Swift maintained a residence in Nashville, Tennessee.

ORIGINAL RESPONSE:

To the extent the term “return” is meant to imply transfer of ownership, from Jeffrey Reinking to Travis Reinking, denied. Further answering, Jeffrey Reinking has no firsthand knowledge of this fact other than what can be learned in the media. As such, admitted upon what has been learned through media.

SUPPLEMENTAL RESPONSE:

To the extent the term “return” is meant to imply transfer of ownership, from Jeffrey Reinking to Travis Reinking, denied. Further answering, after reasonable inquiry, the information known or readily obtainable is insufficient to enable Jeffrey Reinking to admit or deny. Jeffrey Reinking has no firsthand knowledge of this fact other than what can be learned in the media. One recent article, <https://www.cnn.com/2018/05/03/pictures-of-taylor-swifts-2-point-95-million-beverly-hills-house.html>, advises Taylor Swift maintains a home in Beverly Hills, CA. As such, the information known or readily obtainable is insufficient to enable Jeffrey Reinking to admit or deny the place of Taylor Swift's residence.

30. Admit that since April 22, 2018, you have corresponded with one or more individuals in Nashville, Tennessee, about Travis Reinking's criminal proceedings.

ORIGINAL RESPONSE:

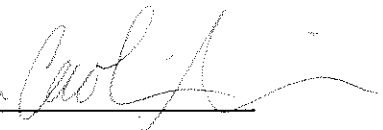
Objection, the request is irrelevant and immaterial to any triable issue that could be submitted to a finder of fact in this matter. Further objecting, this

Request contains undefined terms, is vague, and is not reasonably limited in scope.

SUPPLEMENTAL RESPONSE:

Objection, this Request is irrelevant and immaterial to any triable issue that could be submitted to a finder of fact in this matter. Further objecting, this Request contains undefined terms, is vague, and is not reasonably limited in scope. Subject to, and without waiving objections, to the extent "corresponded" is meant to imply written correspondence, denied. To the extent "corresponded" is meant to imply oral communications, admitted.

Respectfully submitted,

CORY MILLER with permission 

PARKS T. CHASTAIN

Registration No. 13744

DIRECT: (615) 630-7717

(615) 256-8787, Ext. 114

pchastain@bkblaw.com

CORY R. MILLER

Registration No. 34770

DIRECT: (615) 630-7745

(615) 256-8787, Ext. 145

cmiller@bkblaw.com

BREWER, KRAUSE, BROOKS & CHASTAIN, PLLC

545 Mainstream Drive, Suite 101

Nashville, TN 37228

JOEL E. BROWN

416 Main Street, Suite 1300

Peoria, IL 61602-1133

309-673-4357

jb@joelebrown.com

Attorneys for Defendant, Jeffrey L. Reinking

CERTIFICATE OF SERVICE

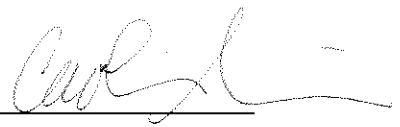
I hereby certify that on this 16th day of November, 2018, a true and correct copy of the foregoing has been sent, via first-class mail, postage prepaid, or by e-mail, to:

Daniel A. Horwitz, Esquire
1803 Broadway, Suite 531
Nashville, TN 37203

Brian Manookian, Esquire
Cummings Manookian
45 Music Square West
Nashville, TN 37203

Joel E. Brown, Esquire
416 Main Street, Suite 1300
Peoria, IL 61602-1133

Mr. Travis Reinking
JMS No. 878721
Control No. 577520
P. O. Box 196383
Nashville, TN 37219-6383

CORY MILLER with permission 
PARKS T. CHASTAIN
CORY R. MILLER